

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Seth L. Blum
Bessy G. Blum,

Debtors.

Chapter 11

Case No. 25-10005-NVA

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned counsel enters an appearance in the above-captioned case on behalf of Coastal Club Homeowners Association (the “Association”) and requests that the Association be added to the official mailing matrix and service list in these cases and that all notices and other papers filed or served in the above-captioned case be served upon the following attorney:

Brent C. Strickland, Esq.
WHITEFORD, TAYLOR & PRESTON L.L.P.
8830 Stanford Boulevard
Suite 400
Columbia, MD 21045

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced case and proceedings herein.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of the Association including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Association is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: January 26, 2026

Respectfully submitted,

/s/ Brent C. Strickland

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Counsel to Coastal Club Homeowners Association

CERTIFICATE OF SERVICE

I hereby certify that on this January 26, 2026, I reviewed the Court’s CM/ECF system and it reports that an electronic copy of the foregoing Notice will be served electronically by the Court’s CM/ECF system on the following parties:

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/s/ Brent C. Strickland

Brent C. Strickland